KANSAS

Kathleen Sebelius, Governor
Roderick L. Bremby, Secretary

DEPARTMENT OF HEALTH
AND ENVIRONMENT

www.kdheks.gov

Division of Environment

April 26, 2007

Jerome E. Cibrik, P.G.
Union Carbide Corporation - Remediation Technology Section
P.O. Box 8361
3200/3300 Kanawha Turnpike
South Charleston, WV 25303

474880

RCRA RECORDS

RE: Draft Offsite Predesign Investigation Work Plan, Former Unison Transformer Services, Inc. Site, Fairfax District, Kansas City, Kansas, Consent Order # 97-E-0036

Dear Mr. Cibrik:

The Kansas Department of Health and Environment (KDHE) has completed review of the above referenced document submitted by Union Carbide Corporation (UCC) for the Former Unison Transformer Services Site located at 3126 Brinkerhoff Road, Kansas City, Kansas. The document was prepared on behalf of UCC by CH2M Hill and was received February 1, 2007. KDHE has the following technical review comments and expects written response within 30 days of receipt of this letter.

1. KDHE suggests that Unison consider including three-dimensional renderings of the off-site plume similar to that which are found in the February 1999 Plume Delineation Report.

2. Include in Section 2.2 Data Gaps, a bullet item presenting that shallow ground water east of ground water monitoring well MW-90 has not been adequately characterized and may require further characterization. Since shallow ground water contamination has shown up in off-site ground water monitoring wells MW-86s and MW-90s, KDHE believes that additional "shallow" ground water monitoring wells should be included in eastern reaches of the ground water plume (for example, in and around locations MW-96, MW-97, GP-302-1, GP-302-2, et. al.)

3. Please plot the potentiometric surface on figure 1-4.

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4. Include applicable Kansas Risk-Based Standards for Kansas, RSK Manual – 3rd Version, March 2003, screening values on figures 1-5 and 1-6. Also note that an updated version of the RSK manual is scheduled for release in or around July 2007.

5. Since there is confirmed cis-1,2-dichloroethylene in ground water monitoring wells MW-98, MW-99 and MW-100, KDHE recommends expanding the off-site, pre-design investigation further to the east (closer to Fiberglass Road). If Unison and/or its contractor cannot or chooses not to comply with this request, Unison must provide the complete technical rationale for omitting this critical area. Work can be performed in the easement if necessary.

6. KDHE recommends that Unison include figures depicting the aerial nature and extent of the ground water plume as referenced in bullet item 4, on page 2-1, section 2.1 – Current Understanding of Conceptual Site Model. Please include figures for the parent and daughter constituents.

7. Unless Unison has specific references that it can site, please remove the following statement from section 2.1, bullet 5, "Portions of the cis-1,2 DCE plume may be attributed to sources other than the site."

8. On page 3-4, Unison writes that anomalous MIP (membrane interface probe) data "will be closely scrutinized during the survey ... if additional sources of contamination are identified ... away from the Unison plume, then additional MIP survey work *will not be performed* (emphasis added) to identify these other potential sources." Unison has admitted that added characterization work is needed and hence the submittal of and commitment to implement the tasks identified in this work plan. It is unclear as to how Unison can assume that plume artifacts adjacent to the already identified plume are or are not associated with known ground water contamination. Initially provide the criteria that will be used to "closely scrutinize" and assess whether newly identified source(s) are or are not associated with the Unison plume. While KDHE is not asking Unison to characterize ground water contamination outside of their responsibility, KDHE requires Unison to report ANY anomalous data to KDHE so that KDHE can evaluate the data within the broader context of the greater Fairfax Industrial District.

9. Because this is a mature alluvial system bedrock topography can be uncertain. For example ancestral channels can have a profound impact on contaminant nature/extent and fate/transport. KDHE requires that Unison add direct push data points adjacent and perpendicular to the known plume axis to better characterize the bedrock topography.

10. KDHE notes that it has been nearly 8 years since the information for the off-site plume has

been updated. Therefore, this offsite predesign investigation presents an excellent opportunity to site additional ground water monitoring wells to provide more credible plume definition. KDHE requires that Unison consider adding ground water monitoring points in appropriate locations to address data gaps in these off site areas.

11. KDHE suggests that Unison add a sample summary table to this work plan that shows for all phases of work the expected numbers of samples, sample media and requested analytical parameters.

If you have comments or questions I can be reached at johncook@kdhe.state.ks.us or (785) 296-8986.

Sincerely,

John K. Cook, L.P.G.
Remedial Section/State Cooperative Unit
Bureau of Environmental Remediation

JKC/ds

cc: File: C4-105 70168 1.0
Michael B. Davis, EPA Region 7, RCAP
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FORM A-2

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